

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

STACY ARNOLD,

Plaintiff,

v.

Case No. 5:19-CV-06137-BP

CITY OF ST. JOSEPH, ST. JOSEPH
PUBLIC LIBRARY and OFFICER
REBECCA HAILEY,

Defendants.

**DEFENDANTS' MOTION FOR COSTS IN THE NATURE ATTORNEY'S FEES AS
PREVAILING PARTY UNDER 42 U.S.C. SECTION 1988**

COME NOW Defendants, City of St. Joseph ("the City") and Officer Rebecca Hailey ("Officer Hailey"), by and through undersigned counsel, pursuant to F.R.C.P. 54(d)(2), as prevailing parties in the above-captioned case, and hereby submit their Motion for Attorney's fees. Defendants' itemized Bill of Costs, filed contemporaneously herewith, and the fair estimate of fees incurred prior to the filing of this motion, is attached hereto as Exhibit 1. Defendants request that their attorney's fees be taxed as costs against Plaintiff pursuant to 42 U.S.C. § 1988 and Fed. R. Civ. P 54(d) in the amount of \$38,112.70.

Respectfully submitted,

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OF ST. JOSEPH AND REBECCA HAILEY

CERTIFICATE OF SERVICE

I hereby certify the original of the above and foregoing document was filed with the Court through the Court's electronic filing system and served via electronic mail on January 19, 2021, to:

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ATTORNEY FOR DEFENDANT ST.
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/s/ Christopher L. Heigele
Attorney for Defendants City of St. Joseph
and Rebecca Hailey